

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
AMYRIS, INC., <i>et al.</i> , ¹)	Case No. 23-11131 (TMH)
Debtors.)	(Jointly Administered)

**SECOND AMENDED VERIFIED STATEMENT OF THE AD HOC NOTEHOLDER
GROUP PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession (the “Debtors”), Paul Hastings LLP (“Paul Hastings”), Blank Rome LLP (“Blank Rome”) and MoloLamken LLP (“MoloLamken”, and together with Paul Hastings and Blank Rome, “Counsel”) hereby submit this second amended verified statement (the “Second Amended Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with Counsel’s representation of an ad hoc group (the “Ad Hoc Noteholder Group”) of holders, or investment advisors, sub-advisors, or managers of discretionary accounts that hold the 1.50% Convertible Senior Notes due 2026 (the “Convertible Notes”), issued pursuant to the Indenture by and between Amyris, Inc., as issuer (“Amyris”), and U.S. Bank National Association, as trustee, dated as of November 15, 2021, and as amended, supplemented, amended and restated or otherwise modified from time to time.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/Amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

1. On or around March 28, 2023, the Ad Hoc Noteholder Group retained Paul Hastings as counsel in connection with a potential restructuring of the Debtors. Each member of the Ad Hoc Noteholder Group has consented to Paul Hastings' representation.

2. On or around August 12, 2023, the Ad Hoc Noteholder Group retained Blank Rome as counsel in connection with a restructuring of the Debtors. Each member of the Ad Hoc Noteholder Group has consented to Blank Rome's representation.

3. On or around October 16, 2023, the Ad Hoc Noteholder Group retained MoloLamken as counsel in connection with a restructuring of the Debtors. Each member of the Ad Hoc Noteholder Group has consented to MoloLamken's representation.

4. On August 24, 2023, Counsel filed the *Verified Statement of the Ad Hoc Noteholder Group Pursuant to Bankruptcy Rule 2019* [D.I. 129]. On October 17, 2023, Counsel filed the *Amended Verified Statement of the Ad Hoc Noteholder Group Pursuant to Bankruptcy Rule 2019* [D.I. 579]. Subsequently, the members of the Ad Hoc Noteholder Group and the disclosable economic interests such members hold in relation to the Debtors have changed. Accordingly, pursuant to Bankruptcy Rule 2019, Counsel submits this Second Amended Verified Statement.

5. The members of the Ad Hoc Noteholder Group are either the beneficial holders of, or the investment advisors or managers to, funds and/or accounts that hold disclosable economic interests in relation to the Debtors. In accordance with Bankruptcy Rule 2019, attached hereto as **Exhibit A** is a list of the names and addresses for each member of the Ad Hoc Noteholder Group, the amount of the disclosable economic interests held by each member of the Ad Hoc Noteholder Group, as of January 4, 2024 (as certified to Counsel by each member of the Ad Hoc Noteholder Group). The information contained in **Exhibit A** is based upon information provided by the members of the Ad Hoc Noteholder Group to Counsel and is subject to change.

6. As of the date of this Second Amended Verified Statement, Counsel represents only the members of the Ad Hoc Noteholder Group and does not represent or purport to represent any persons or entities other than the Ad Hoc Noteholder Group in connection with the Chapter 11 Cases.² In addition, as of the date of this Second Amended Verified Statement, the Ad Hoc Noteholder Group does not, either collectively or through its individual members, represent or purport to represent any other persons or entities in connection with the Chapter 11 Cases.

7. The information contained in this Second Amended Verified Statement and **Exhibit A** attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any member of the Ad Hoc Noteholder Group, including, without limitation, the right to assert, file and/or amend any proof of claim in accordance with applicable law and any orders entered in these Chapter 11 Cases.

8. The information contained in **Exhibit A** is based upon information provided by the applicable members of the Ad Hoc Noteholder Group. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests in the Debtors, except for claims for services rendered to the Ad Hoc Noteholder Group. The Ad Hoc Noteholder Group, through Counsel, reserves the right to amend and/or supplement this Second Amended Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

² Blank Rome, Delaware counsel to the Ad Hoc Noteholders Group, also represents certain other parties in these chapter 11 cases. An ethical wall has been established between the Blank Rome professionals working on behalf of the Ad Hoc Noteholders Group and Blank Rome professionals representing other parties in these chapter 11 cases.

Dated: January 4, 2024
Wilmington, Delaware

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